

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

FILED

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

11

Division

2024 FEB 16 A 10:48

U.S. DISTRICT COURT
N.D. OF ALABAMA

Tacarius Wills

Case No.

1:24cv190-CLM
(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The WEAVER police department; Nicholas Quinn;
Calhoun county Sheriff's office; Calhoun county District
Court; Sheriff Mathew Wade

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ NoCOMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tacarius Wills		
Address	52650 US HWY 78		
	Eastaboga	AL	36260
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Talladega (previously residing in Calhoun county)		
Telephone Number	(256)-770-2126		
E-Mail Address	tcwills13@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	The Weaver Police department		
Job or Title (if known)	Public Safety/Law Enforcement agency		
Address	500 Anniston Street		
	Weaver	AL	36277
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	256 820 0530 (or local "911")		
E-Mail Address (if known)			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name	Nicholas Quinn (of the Weaver Police department)		
Job or Title (if known)	Police officer; Alabama Peace officer; Public Servant		
Address	500 Anniston Street		
	Weaver	AL	36277
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Calhoun County		
Telephone Number	256 820 0530 (or local "911")		
E-Mail Address (if known)			
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name Calhoun County Sheriff's Office
 Job or Title (if known) Public Safety/Law enforcement agency/Correctional facility
 Address 400 W eighth street
 Anniston AL 36201
 City State Zip Code
 County Calhoun County
 Telephone Number 256 236 6600
 E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

Defendant No. 4

Name Calhoun County District Court
 Job or Title (if known) District court/district attorney's office/court clerk's office
 Address 25 W 11th street
 Anniston AL 36201
 City State Zip Code
 County Calhoun county
 Telephone Number 256 231 1750
 E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? I, Tacarius Wills, constitutional rights and amendments have been consistently violated for over 3 consecutive years. 1st Amendment violations in the name of intimidatory retaliation against my YouTube videos, Facebook live recordings of CONSTANT illegal traffic stops, and TikTok videos of multiple officers sighing Calhoun county in a group alliance. 2nd amendment on TWO accounts without felonies, or misdemeanor of DV, or drug related charges. 4th amendment to note alongside.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
- This officer Nicholas Quinn has ACTUALLY acted in this manner seeking unhealthily targeted interests in me since 2021. He has as well as multiple officers of the weaver police department made it their dirty to stop me every time they see me even if they have to PERJURIZE an arrest from a frivolous traffic stop.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
These events repeatedly occur in the SAME city, on the SAME stretch of road: Jacksonville State University Highway (AL HWY 21).
- B. What date and approximate time did the events giving rise to your claim(s) occur?
Jan 21, 2020 (John Benavides- Weaver PD), 12/21/2020 (Nicholas Quinn -Weaver PD (the same road JSU highway AL HWY 21), 02/23/2021 (the court date for 12/21/20 @ 500 Anniston street Judge Beth Rogers), 03/17/21 (illegal traffic stop by Jaylen Jackson, who is involved in conversation with talladega police officer ID #623), 05/05/2021 Lincoln police ID# 527; 05/11/21 Anniston police at my house; 08/21/21; 10/16/21; 10/18/21; 08/15/22, 08/20/22, 08/23/22; 01/24/23
- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)
In short and simple, the police in and nearby Calhoun county have most certainly acted under the color of law in the misuse of law enforcement, various police officers teaming up and repeatedly harassing, using intimidation tactics, trespassing on my private property. More times than not, officers would issue me citations for "lane change violations" as to which I would record them and post a YouTube video (that THEY DO WATCH) for the simple fact that in the description of the citation, it would say "blinker blinked TWICE prior to lane change.." yet they still REPEATEDLY continued to conduct repeated illegal traffic stops on me. Any time I contested or challenged these violations, and got them dismissed/found not guilty, these officers COMMUNICATED WITH STATE TROOPERS, and they began to navigate to my house and repeatedly either stop directly in front of my house in a residential neighborhood NOT related to the interstate or county roads/bypasses/city streets, follow me out of my neighborhood the instant I exited my driveway, or they would falsify charges stemming from, again, a harassing traffic stop to arrest me and seize my firearms, OVERSETTING the bail limit for the arrest/charges, impound my vehicle, just for me to GO TO COURT, and PROVE with RETAINED COUNSEL, REVILL, to be NOT GUILTY.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Financial issues, loss of wages, loss of time, mental distress/emotional distress, stolen property on multiple accounts, LOSS OF VEHICLES, DEFAMATION OF CHARACTER, slander, smear campaigns. Loss of POTENTIAL to earn wages as it is CONSTANTLY an issue for me to pass background checks at hvac contractors and heating and cooling companies, MVR slandered, RIDICULOUSLY HIGH (in greater than \$650/month) insurance rates on my vehicles, having to move back home after selling my house I purchased at 19 years old by myself BECAUSE of the field of HVAC. Also, not feeling the "right of the people to be secure in their persons against unlawful searches, seizures, etc". The right to bear arms being taken from me, my 1st amendment (my YouTube videos, TikTok videos, Facebook Live videos being the EXACT reason for the retaliation) being taken from me. 5th amendment violation as clearly I'm not dealing with fair judgement, AND dealing with double jeopardy, weaver police and the Calhoun county sheriffs office, have quite literally tried to charge me ILLEGALLY WITH "attempting to elude" TWICE, and were unsuccessful on the SECOND ATTEMPT, because I not only had my dashcams, but I retained legal representation by VICTOR REVILL LAW FIRM. These injuries are the result of VEXATION, or VEXATIOUS LITIGATION, and this is a very common tactic all of the police departments in Calhoun county use, in refer to whistleblowing and defending yourself with the use of your 1st amendment. These Vexatious acts were intentional, to harass, financially oppress, overwhelm, ENTRAP, and violate my rights, all of which were violated multiple times, in the SAME COUNTY, by the SAME police department, THE SAME judges (Beth Rogers, Randy J Moeller, Hon. Jana Roberts, Derek Walton "Walton and Walton" whom, Derek Walton committed legal malpractice in the original case in December of 2021.)

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am demanding IN TORT, money damages, \$2,000,000.00. This is due to the fact that police officers are entrusted government officials who are sworn in UNDER THE COLOR AND OATH of law to NOT BEHAVE in "alliance/multiple parties of authority teaming up to silence, target, harass one person who spoke out against them" behavior. This pattern of abuse UNDER THE COLOR OF LAW, as well as the PERJURY having been proven in a STATE COURT level at that. Also, every single police officer who took an action of this behavior is to be held accountable for making me feel a constant state of anxiety, fear for my life, stole something from me, unlawfully detained or arrested me, made illegal traffic stops, and tarnished my name is to be held accountable.

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VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/01/2024

Signature of Plaintiff

Printed Name of Plaintiff Tacarius Wills

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Print

Save As...

Add Attachment

Reset

Page 6 of 6

STATE OF ALABAMA Unified Judicial System Form _____ Revised 9/07	APPLICATION AND REQUEST FOR ACCESS TO THE ALAFILE SYSTEM	PS----- Verification Code: 44d69b73
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NOTICE/DIRECTIONS TO REQUESTER

In order to process your request for access to the AlaFile system, you must sign this completed form under penalty of perjury. The completed form must then be physically delivered to the office of the Circuit Clerk of the county in which you reside. At the Clerk's office, you will need to present your government issued photo identification for verification. The Clerk will make and retain a photocopy of your government issued photo identification. The Clerk's office will then activate the password that you have selected which will then authorize and allow you to access the AlaFile application from your computer and make e-filings.

All filings or other submissions of documents to the Court using this password will be processed and evaluated in accordance with the *Alabama Rules of Civil Procedure*, *Alabama Rules of Judicial Administration*, and *Administrative Procedure for Filing, Signing, and Verifying Documents by Electronic Means in the Alabama Judicial System* and any other applicable statutes, rules, or procedures. A copy of Administrative Procedure is available to you at <http://efile.alacourt.gov/>.

You will not be charged any fees for registering for AlaFile, although you will be subject to the normal and required filing fees that are charged to all parties for similar paper filings and you will be required to pay any credit card service fees for any filing fees or other charges that you pay by credit card or debit card.

Name:

TACARIUS	MALIK	WILLS
Business - First	Middle	Last

 Suffix

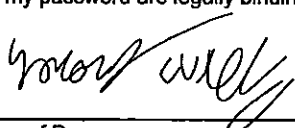
Address:

52650 US HWY 78	EASTABOGA	AL
Address	City	State

(256) 770-2126		tcwills13@gmail.com
Phone	Fax	Email

Acknowledgement:

Under penalty of perjury, I declare that the above information is true and correct and that I am the person named and identified above. I understand that there are security risks involved in the use of my password to make e-filings, including the possibility of unauthorized use of my password, if my password is disclosed to or becomes known to unauthorized users. Security for this password is my responsibility. I agree to accept all such risks and agree that for all filings or pleadings entered into AlaFile made after gaining access to the system by use of my password, I have and do hereby waive any claim or contention that such entries and filings were not authorized by me and waive any claim or contention that such pleadings or their contents are not legally binding upon me. By submitting this application, I irrevocably agree that any documents submitted through the use of my password are legally binding upon me.



 Signature of Pro se

02/02/2024

 Date

Verification of Circuit Clerk or his/her designee:

I have verified the identity of the pro se applicant whose name is signed to the foregoing by visually comparing the photograph on the government issued identification with the appearance of the person presenting this identification to me. I have made a photocopy of the applicant's government issued photo id, scanned that copy into the AlaVault Scan Else Folder Titled "AlaFile ProSe Individual Registration", entered the AlaFile identification number assigned to this pro se e-filing applicant into the System and authorized access to AlaFile.

 Signature of Clerk

 Date

DOCUMENT 20



ELECTRONICALLY FILED
1/24/2023 9:32 AM
11-DC-2022-900240.00
DISTRICT COURT OF
CALHOUN COUNTY, ALABAMA
KIM MCCARSON, CLERK

IN THE DISTRICT COURT OF CALHOUN COUNTY

STATE OF ALABAMA

V.

WILLS TACARIUS MALIK CHANCL
Defendant.

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)
)
)
)
)

Case No.: DC-2022-900240.00

ORDER

Defendant appears with retained counsel, Victor Revill.

Case is hereby dismissed.

DONE this 24th day of January, 2023.

/s/ BETH ROGERS
DISTRICT JUDGE

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2/15/24, 3:15 PM

DOCUMENT 20



ELECTRONICALLY FILED
1/24/2023 9:32 AM
11-DC-2022-900242.00
DISTRICT COURT OF
CALHOUN COUNTY, ALABAMA
KIM MCCARSON, CLERK

IN THE DISTRICT COURT OF CALHOUN COU.

STATE OF ALABAMA

V.

WILLS TACARIUS MALIK CHANCLI
Defendant.

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)
) Case No.: DC-2022-900242.00
)
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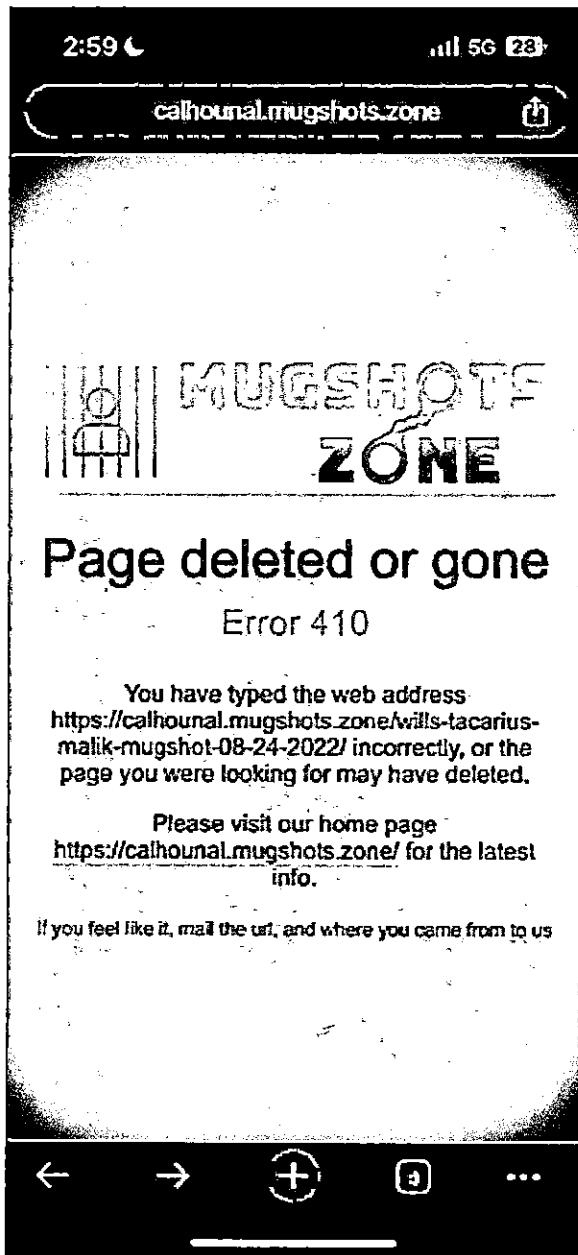
ORDER

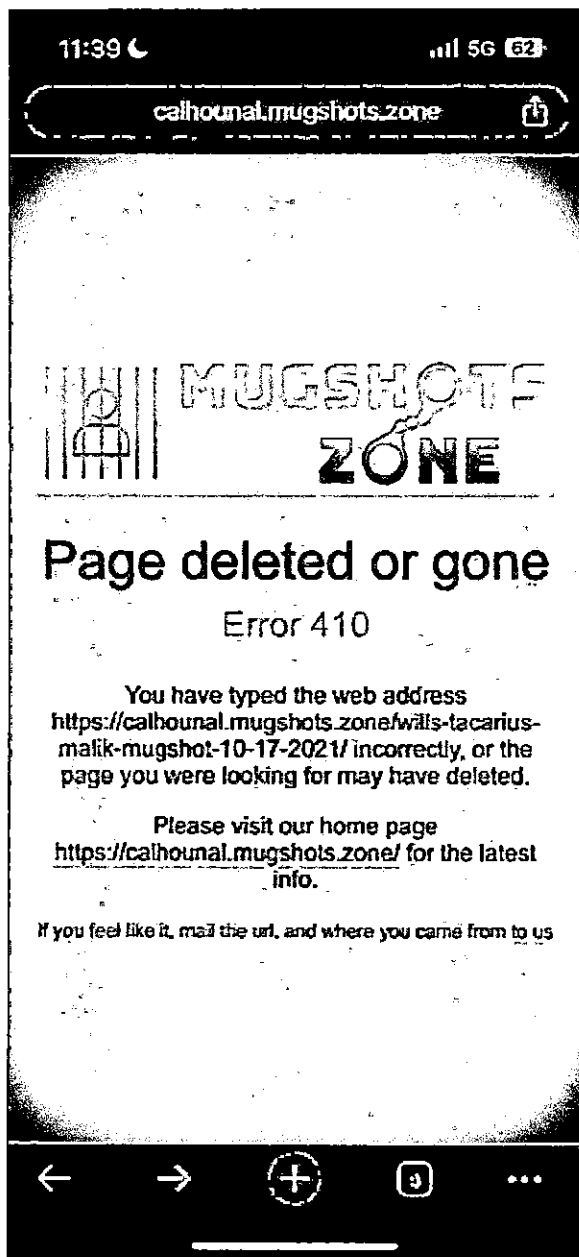
Defendant appears with retained counsel, Victor Revill.

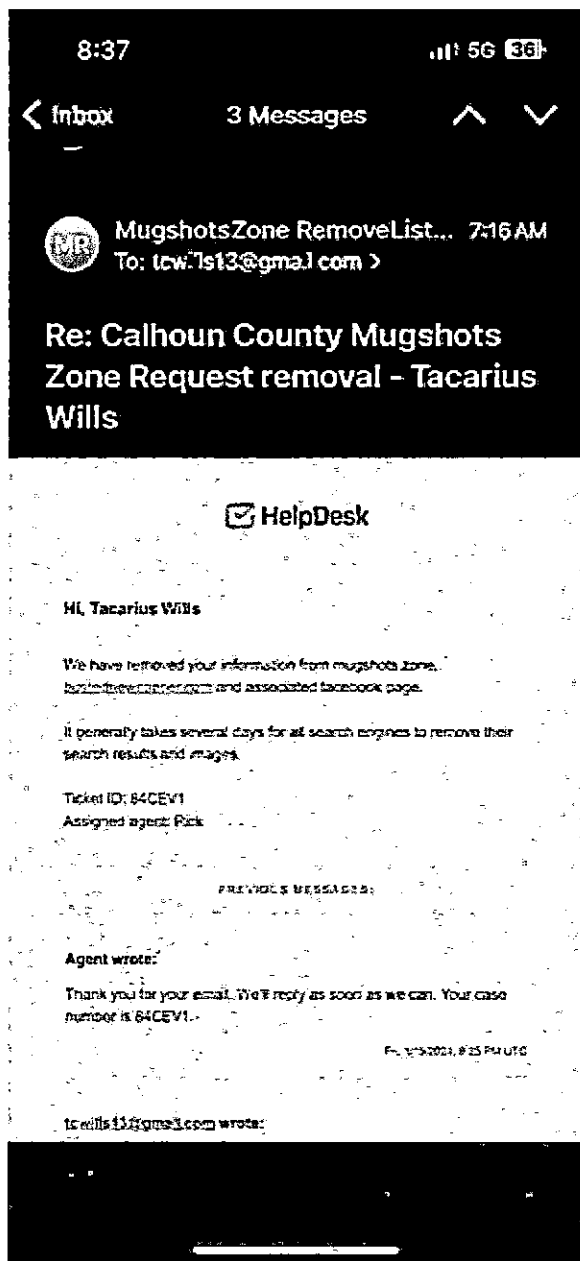
Case is hereby dismissed.

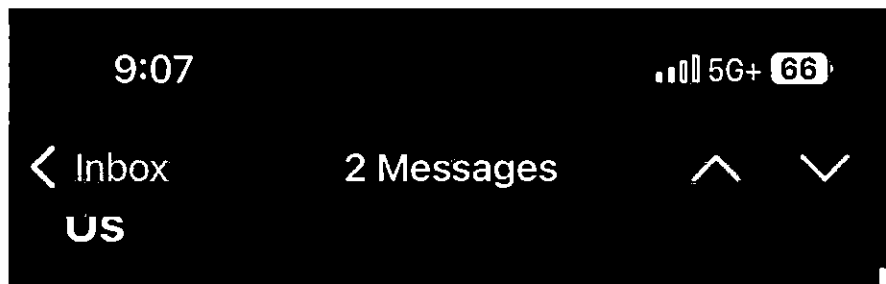
DONE this 24th day of January, 2023.

/s/ BETH ROGERS
DISTRICT JUDGE









Mr. Wills: I have read over your statement and agree that you have been the subject of overzealous and likely unlawful police activity from several individuals and departments.

Brookside dealt with departmental policies directed against thousands of people on the Interstate. Here, your complaints are against several cities and counties for their treatment of you, and it would be most difficult to prove a conspiracy directed against you by all of them.

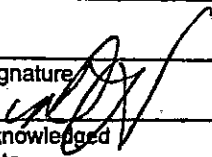
You likely have a false arrest and imprisonment and malicious prosecution case arising out of the situation where you were charged and the cases dismissed. There is a two year statute of limitations and I am sure that your lawyer advised you of that. He would be in the best position to pursue this as he should have all available facts.

Likewise, pistol permits are no longer required and your lawyer can file to get



image0.jpeg

2/15/24, 3:23 PM

Statute 32-5A-133		UCR Code	Mile No.	Road Cd
Described LANE CHANGE W/O PROPER SIGNAL				
Details BLINKER BLINKED TWICE PRIOR TO LANE CHANGE. NOT MORE THAN 100 FT PRIOR TO LANE CHANGE.		MPH _____ Speed Limit BAC _____		
FACTS RELATING TO THE OFFENSE: (Witnesses, etc.)			Crash Involved: NO Companion Case: None	
Officer Name HELLUMS		Officer ID 1527	Agency ORI AL0610400	
Complainant's Signature 				
Sworn to and acknowledged before me this date		Signature and Title		Judge/Magistrate
COURT APPEARANCE INFORMATION				
MUNICIPAL COURT OF LINCOLN LINCOLN MUNICIPAL COURT 150 MAGNOLIA ST LINCOLN, AL 35096			205-763-4020 Court Appearance Date and Time 6/9/2021 2:00 PM	
Defendant must appear in court at said time and place or otherwise comply with the provisions of this complaint and instructions of the notice part of this ticket.				
NO SIGNATURE REQUIRED Pursuant to §32-1-4(a)			Defendant's Phone	
RELEASED ON OWN RECOGNIZANCE				

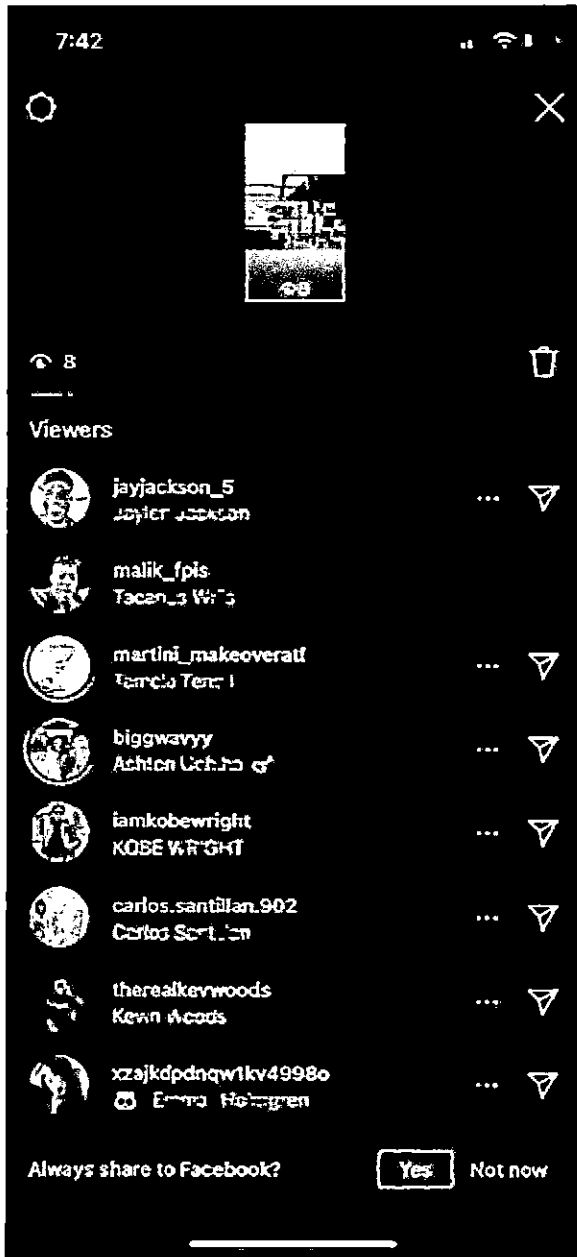
Case:

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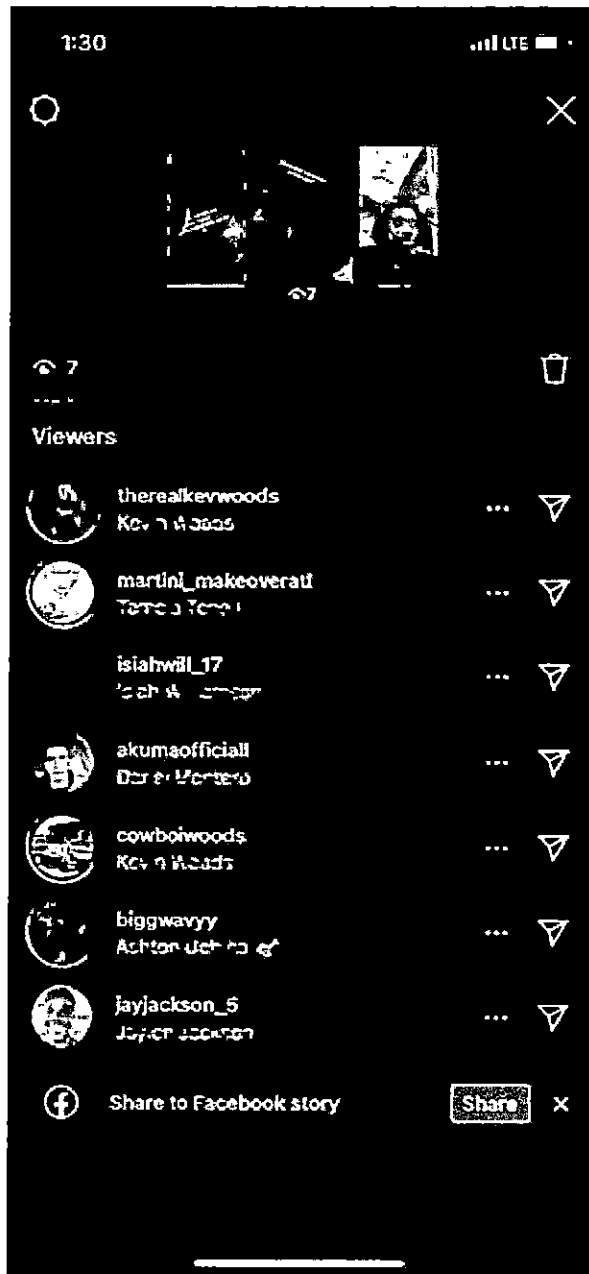
**ANNISTON MUNICIPAL COURT
COURT DOCKET
Wednesday, January 12, 2022**

<i>Defendant/Charge</i>	Case #	Arrest Date	Parties
WILLS, TACARIUS MALIK CHANCLIN (Continued) IMPROPER LANE USAGE 9:00 AM N5200713	TR21-0001592	07/09/2021	ARREST OFFICER: JACKSON, JAYLEN
WILSON, RODNEY LAMAR BLACK M DRIVING WITH LEARNERS PERMIT ONLY	TR21-0002667	11/24/2021	ARREST OFFICER: MCGRAW, DONALD

2/15/24, 3:24 PM



Staring, watching and studying my social media, leaving trails. Facebook, Instagram and TikTok's algorithms let you know when people watch you. I am NOT and never have been friends with Jaylen Jackson. I don't follow him, he does not follow me, but watches me to later devise a harassing traffic stop.



⇒ Again, watching and stalking my Instagram.





people you may know is an Algorithm of Facebook that shows people to you that repeatedly visit your facebook page..

LTC

Tacarius Wills
52650 US Hwy 78
Eastaboga, AL 36260

1/5

Water and Tear Resistant

 UNITED STATES POSTAL SERVICE.		Retail
G	US POSTAGE PAID	
	\$5.10 Origin: 36260 02/15/24 0125900416-4	
USPS GROUND ADVANTAGE™		
		0 Lb 4.00 Oz RDC 01
		C006
SHIP TO: 1729 5TH AVE N BIRMINGHAM AL 35203-2000		
		
USPS TRACKING® #		

Clerk, Hugo L. Black United States Courthouse
1729 5th Avenue North
Birmingham, AL 35203

SECURITY
FEB 16 2024
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA